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Response to ANPR

The following statements are based on over ten years of research on workplace substance abuse prevention. This research led to the development of an evidence-based program, titled "Team Awareness" that has been shown to reduce substance abuse in working adults in safety sensitive occupations. The program ahs been endorsed by the federal government – Department of Health & Human Services (SAMHSA-Substance Abuse and Mental Health Services Administration) – as a scientifically *effective* or *model* program. It is our belief that a comprehensive AND effective prevention strategy should be required as part of a drug free workplace program for the mining industry. (This program works!) Fortunately, the SAMHSA evidence-based approach offers an important vehicle for determining which programs to select. *Team Awareness* is especially relevant for the mining occupations because it was developed specifically for safety-sensitive occupations and has shown to be particularly effective within such occupations. Our organization (OWLS, Inc.) is interested in working with the Department of Labor in integrating this type of program into a strategic occupational approach to dealing with the substance abuse problem, from a prevention standpoint.

A prevention program from substance abuse in the workplace requires being sensitive to occupational subcultures that (1) promote – through traditional social norms and informal policies – the shared or social use of alcohol or drugs and/or (2) develop a reactive and superficial approach to addressing developing problems among individuals, work crews, supervisors, and work units where alcohol or drug use is tolerated. In other words, if a problem exists in an occupation than the logical response is to develop a program that is sensitive to the unique aspects of that occupation. Traditionally, drug-free workplace programs work at the individual level to educate, discipline, and rehabilitate individual workers who abuse alcohol or drugs. In contrast, *Team Awareness*, is customized to the unique occupational norms so that workers can integrate the message of prevention into their daily work routines as part of their work group or work crew. Based on the ANPR it seems that this program would be highly appropriate for the mining industry. It may be considered an intelligent and evidence-based approach to the needs of the occupation.

We have listed scientific references below that should provide a fair overview of the program. In addition, we are attaching the SAMHSA flyer that reviews the program. Fort further information you may contact the developer of *Team Awareness*, Dr. Joel Bennett of Organizational Wellness & Learning Systems, Inc. at (817) 921-4260 or learn@organizationalwellness.com.

¹ An "occupational subculture" is an anthropological term that refers to social norms and traditions that develop within specific occupations. These norms help workers within those occupations to forge a social identity, participate as a member of that group, and understand specific informal "rules" about how work should be conducted (e.g., "police culture," "restaurant culture"). Occupational subcultures teach workers what it means to be "loyal," who should be listened to, what should be tolerated, what should be hidden, secret, or disguised, and what types of communication should be rewarded or punished. Alcohol and drug use can develop as a permissible way of unwinding from stress, showing solidarity, disobeying authority, and otherwise lead workers to feel that they belong to the group.

References

- Patterson, C.R., Bennett, J.B., & Wiitala, W.L., (2005). Healthy and unhealthy stress unwinding: Promoting health in small businesses. <u>Journal of Business and Psychology</u>. 20 (2), 221-247.
- Bennett, J.B., Patterson, C.R., Reynolds, G.S., Wiitala, W.L., and Lehman, W.E.K., (2004). Team Awareness, Problem Drinking, and Drinking Climate: Workplace Social Health Promotion in a Policy Context. <u>American Journal of Health Promotion</u>, Nov-Dec;19(2):103-13.
- Bennett, J. B. (2004, Spring). The Small Business Wellness Initiative: Reaching out with evidence-based programs. <u>Wellness Management</u>, 20(1), 14-16. [on-line newsletter of the National Wellness Institute; www.nationalwellness.org]
- Bennett, J.B. (2003). Using evidence-based workplace training. <u>Journal of Employee Assistance</u>, (3rd Quarter), 12-15.
- Lehman, W. E. K. & Bennett, J. B., (2002) Job risk and employee substance use: The influence of personal background and work environment factors. <u>American Journal of Alcohol and Drug</u> Abuse, 28(2), 1–24.
- Bennett, J.B. (2002, Spring). Beyond drug testing to wellness: Multiple strategies, teambuilding, and problem drinking. Wellness Management. [on-line newsletter of the National Wellness Institute; www.nationalwellness.org]
- Bennett, J.B., & Lehman, W.E.K., (2002) Supervisor tolerance-responsiveness to substance abuse and workplace prevention training: Use of a cognitive mapping tool. <u>Health Education Research</u>, 17 (1), 27-42.
- Bennett, J.B. & Lehman, W.E.K. (2001). Workplace substance abuse prevention and help-seeking: Comparing a team-oriented and informational training. <u>Journal of Occupational Health Psychology</u>, *6* (3), 243–254
- Bennett, J.B., Lehman, W.E.K., Reynolds, G.S., (2000) Team awareness for workplace substance abuse prevention: The empirical and conceptual development of a training program. Prevention Science, 1 (3), 157-172.
- Bennett, J.B. & Beaudin, C., (2000) Modeling research partnerships in prevention: A Framework for collaboration in workplace substance abuse prevention. <u>Journal of Healthcare Quality</u>, 22, 4, 24-30.
- Bennett, J.B. & Lehman, W.E.K. (1999). Exposure to problem coworkers and quality work practices: A case study of employee violence, sexual harassment, and substance abuse. Work & Stress: An International Journal, 13 (4), 299-311.

- Bennett, J.B. & Lehman, W.E.K. (1999). Employee exposure to co-worker substance use and negative consequences: The moderating effects of work group membership. <u>Journal of Health and Social Behavior</u>, 40 (3), 307-322.
- Bennett, J.B., & Lehman, W.E.K. (1998). Workplace drinking climate, stress, and problem indicators: Assessing the influence of team work (group cohesion). <u>Journal of Studies on Alcohol</u>, 59 (5), 608-618.
- Lehman, W.E.K., D. Farabee, J.B. Bennett. (1998). Perceptions and correlates of co-worker substance use. Employee Assistance Quarterly, 13 (4), 1-22.
- Bennett, J.B., & Lehman, W.E.K. (1997). From dual policy to dual attitudes: The social construction of substance use policy. <u>Review of Public Personnel Administration</u>, 17(1), 58-83.
- Bennett, J.B., & Lehman, W.E.K. (1997). Employee views of organizational wellness and the EAP: Influence on substance use, drinking climates, and policy attitudes. <u>Employee Assistance Quarterly</u>, 13 (1), 55-72.
- Bennett, J.B., & Lehman, W.E.K. (1996). Employee attitude crystallization and substance use policy: Test of a classification scheme. Journal of Drug Issues, 26(4), 831-864.